Worksheet
Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management

OFFICE: Winnemucca District Office, Humboldt River Field Office

TRACKING NUMBER: DOI-BLM-NV-W010-2012-0006-DNA

CASEFILE/PROJECT NUMBER: Lease: NVN-048027

PROPOSED ACTION TITLE/TYPE: Expansion of Reserve Pits and Pump Testing for Well No. 44-28

LOCATION/LEGAL DESCRIPTION: T.31N. R.33E., sec 28, SE1/4 NW1/4

APPLICANT (if any): Presco Energy, LLC

A. Description of the Proposed Action with attached map(s) and any applicable mitigation measures.

Presco Energy, LLC proposes to expand and deepen a reserve and a test pit on well site 44-28 and connect them by means of a trench in preparation for a flow test to gather geothermal data (proposed action). The existing pits were originally analyzed in Humboldt House Geothermal Project Construction and Testing of Geothermal Well No. 44-28 Environmental Assessment (October 1991) (NV-020-02-02) (Humboldt House Geothermal EA). The test pit increased to its current size through a geothermal sundry (N26-92-005GS) (April 24, 1992). The same well site was analyzed in Rye Patch "A" Geothermal Project Environmental Assessment (September 1992) (EA-NV-020-02-37) (Rye Patch EA). The test pit is 7-10 feet deep and trapezoidal with the four sides measuring 320 feet, 400 feet, 230 feet and 350 feet; clockwise from north to west. The reserve pit is rectangular in shape and measures 60 feet wide by 70 feet long by 7 feet deep.

The proposed expansion of the test pit would extend east from the northeast quadrant of the original trapezoid with sides of 80 feet, 150 feet, 150 feet and 200 feet. The proposed deepening is planned to be up to a total depth of 30 feet, depending on material encountered. The expansion of the reserve pit is proposed to extend to the west an additional 30 feet by 60 feet. There is no depth increase proposed for the reserve pit. A trench is also proposed to connect the two pits to allow overflow from the reserve to the test pit. The trench is proposed to be 10 feet wide by 100 feet long and approx. 5 feet deep. The increased surface disturbance from the three structures would measure 0.81 acres. This longer flow test would be performed to 1) clean out remaining drilling fluids, 2) determine the sustainable yield of the well, 3) determine the interaction with other wells in the field, and 4) provide data in support of reservoir modeling. The flow rate

would be monitored for twenty-four hours a day, seven days a week and would be carefully controlled to maintain a constant level in the test pit. The flow period duration would be determined by surface storage capacities of the test pit, as deepened. The duration of the flow test would be sufficient to achieve stable reservoir conditions or for 30 days, whichever is less.

Mitigation measures were developed through this DNA process for the Expansion of Reserve Pits and Pump Testing for Well No. 44-28 to reduce and/or mitigate environmental or resource impacts. These mitigation measures, applicable lease stipulations, and all applicable conditions of approval associated with the documents referenced in Item C (below) contain appropriate measures to mitigate any identified impacts from the operations and would be applicable to the proposed action.

B. Land Use Plan (LUP) Conformance

LUP Name: Sonoma-Gerlach Management Framework Plan (MFP)
Date Approved: July 9, 1982

The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decision:

M 5.1 - Make no land use decision that would interfere with or prevent geothermal leasing, exploration, and/or development on public lands, or any other lands containing federally owned minerals, classified by the U.S. Geological Survey as Prospectively Valuable for Geothermal Resources, or land classification as Known Geothermal Resource Areas (KGRA).

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

List by name, number and date (DR/FONSI or ROD) all applicable NEPA documents that cover the proposed action.

Humboldt House Geothermal Project Construction and Testing of Geothermal Well 44-28 Environmental Assessment Decision Record and Finding of No Significant Impact (October 1991) (NV-020-02-02)

Rye Patch "A" Geothermal Project Environmental Assessment Decision Record and Finding of No Significant Impacts (December 1992) (NV-020-02-37)

Standard Mine Project Expansion Environmental Assessment Decision Record and Finding of No Significant Impact (February 2010) (DOI-BLM-NV-W010-2010-0002-EA)

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

Geothermal Drilling Permit (GPD) or Application for Permit to Drill for Well No. 44-28 (N26-92-001GAPD)(9/25/91).

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA documents(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Yes. The proposed action to expand the test and reserve pits and to test well 44-28 through discharge would be essentially similar to the proposed actions in the Humboldt House Geothermal and Rye Patch EAs. The type of surface disturbance would be the same but in a location next to the original pits.. Another difference is the discharge fluid would not have to be piped a half mile distance, as described in the Humboldt House Geothermal EA. Instead, the proposed action would keep the discharge fluid in a test pit near the well.

The proposed action would be located in the same analysis area as analyzed in the Humboldt House Geothermal and Rye Patch EAs.

The proposed action would also be essentially similar to the proposed action and action alternatives analyzed in the Standard Mine Project Expansion Environmental Assessment (February 2010) (DOI-BLM-NV-W010-2010-0002-EA) (Standard EA). The difference would be that the Standard EA analyzed the effects of expansion of a gold mining project area. The type of surface disturbing activities, such as vegetation removal and digging, would be similar, but the size of this proposed action of .81 acres is much smaller than the proposed 123.3 acres of surface disturbance on public lands analyzed in the Standard EA.

The proposed action would be 1-2 miles from the project analyzed in the Standard EA Therefore, the proposed action would be in a similar geographic area and with similar resource conditions as those analyzed in the Standard EA **2. Is the range of alternatives analyzed in the existing NEPA documents(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?**

Yes. The Humboldt House Geothermal and Rye Patch EAs analyzed a proposed action and no action alternative for the development and testing of well 44-28 and are therefore appropriate to this proposed action. The testing activity and the increase of the test and reserve pits would remain on the existing well site. Current environmental concerns,

interests, and resource values that have arisen since 1992 include issues relating to migratory birds and sage grouse; which these EAs did not address. Migratory bird surveys and sage grouse studies were completed during the analysis of the Standard EA. Migratory birds and sage grouse habitat were observed in the project area for the Standard EA. However, the sage grouse habitat is east of this proposed action and would not be involved in the activity on the well site.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes, the existing analysis is still valid in light of new information and circumstances. Since the Humboldt House Geothermal and Rye Patch EAs were completed in 1992, new guidance has been implemented regarding migratory birds (Executive Order 13186 [2001] and sage grouse (United States Department of Interior determination of warranted but precluded status [2010]). Although the Humboldt House Geothermal and Rye Patch EAs did not address these resources, the Standard EA did analyze impacts to these resources from similar activity to the proposed action in accordance with the new guidance. This new guidance should not substantially change the analysis of the proposed action.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes, the methodology and analytical approach used in the existing documents is appropriate for the proposed action. The Humboldt House Geothermal EA analyzed 2.4 acres of disturbance. The Rye Patch EA analyzed approximately 81 acres of disturbance. Both of these EAs analyzed the effect of the proposed action on geology and soils, hydrology (surface and ground), meteorology and air quality, biological resources, range resources, cultural and paleontological resources, visual resources, noise, land use and status and socio-economics. Any potential impacts from the proposed action would be similar in these analyses, except for the size of the disturbance. The incremental impact would be an additional .81 acres of disturbance.

The Standard EA analyzed effects of 123.3 acres of public land (181.5 acres total) of surface disturbance associated with the mine expansion on air quality, wildlife (including migratory birds and special status species), invasive, non-native species, wastes (hazardous and solid), water quality (including wetlands and riparian zones), geology, noise and vibration, paleontology, range, recreation, social values and economics, soils, vegetation and visual resources. Accordingly any direct, indirect, and cumulative effects that would result from implementation of the new proposed action would be similar to those analyzed in the existing NEPA documents except for the size of the disturbance.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes, the public involvement and interagency review associated with the existing documents is adequate for the current proposed action. The Standard EA had a public scoping process that communicated the Proposed Action and then the Preliminary EA to 920 potentially interested parties. The returned comments did not include any reasonable question of impact to the lands that was not already addressed in the environmental analysis. The Rye Patch EA reported the occurrence of two public hearings by the Pershing County Planning Commission for consideration of issuance of a Special Permit to Rye Patch Limited Partnership to construct and operate the Geothermal Project. For the Rye Patch EA, interagency review included consultation of the U.S. Soil Conservation Service, the Nevada Department of Environmental Protection, Pershing County, and the Nevada Natural Heritage Program. The Standard EA interagency review included consultations with the Nevada Department of Wildlife, The Nevada Division of State Parks, The Nevada Natural Heritage Program, the U.S. State Fish and Wildlife Service, the Lovelock Paiute Tribe the Winnemucca Indian Colony, and the Battle Mountain Band Council.

E. Persons/Agencies/BLM Staff Consulted

See Attached Section E for Review Signatures and Conclusion